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July 2, 2025

VIA ECF
Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: IME Watchdog, Inc. v. Gelardi, et al. – Case No. 1:22-cv-01032 (PKC)(JRC)
Notice of Critical Filing Relevant to Plaintiff's July 1 Submissions

Dear Judge Chen:

Defendants respectfully notify the Court that on July 1, 2025, we filed a Motion to Strike and Dismiss (ECF No. 526), which directly contradicts and rebuts the foundation of Plaintiff's multiple filings submitted the same day, including ECF 521 (Motion to Seal), the damages submissions, and the declarations filed in support.

The Motion to Strike provides sworn affidavits, emails, and documentary evidence exposing material falsehoods and contradictions by Plaintiff's principal witnesses, including Adam Rosenblatt and Daniella Levi. These factual discrepancies go directly to the credibility of the claimed damages and raise serious concerns about the propriety of sealing the very documents used to support them.

Notably On June 27, 2025, the Court issued an Order directing Defendants to explain their inclusion of Plaintiff's customer list in a prior filing. Defendants promptly complied, clarifying that the document had been previously filed by Plaintiffs, was not sealed or designated confidential, and was publicly available on the docket at the time it was retrieved. Plaintiffs had several days to file a response but instead chose to submit their opposition—and a flurry of additional filings—on July 1. Some were filed in the morning, before Defendants' Motion to Strike (ECF 526) appeared on the docket, and others followed shortly thereafter. Defendants are concerned that this timing may have been intended to distract from or obscure the critical factual issues raised in the Motion to Strike.

Given the weight of the evidence in ECF 526, the Defendants respectfully request that the Court defer consideration of Plaintiff's damages and sealing motions until the Motion to Strike has been fully reviewed.

Respectfully submitted,

Safa Gelardi (Pro Se Defendant)